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**HOLLAND & HART**

ATTORNEYS AT LAW

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WASHINGTON, D. C. 20006  
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TELECOPIER (208) 343-8669

May 30, 1985

2162235 - R8 SDMS

Mr. William F. Smith  
Special Agent  
U.S. EPA  
999 Eighteenth Street  
One Denver Place, Suite 1300  
Denver, CO 80202/2413

Re: Frankel Manufacturing Co.  
5125 Race Court - Denver

Dear Mr. Smith:

In my letter of May 21, on behalf of Frankel Manufacturing Company, I requested that you return to me those documents which were Frankel's original or only copies when taken by EPA on April 25. Yesterday, I had a conversation with Michael Risner of the EPA Regional Counsel's office, in which he indicated his understanding that none of the documents taken by EPA were original or only copies, and that copies of all documents taken on April 25 had been left with or supplied to Frankel. That is not the case.

Having had Frankel personnel reconfirm my understanding, I can state that, to the best of our knowledge, Frankel does not now have originals or copies of any of the documents listed on EPA's April 25, 1985 "Receipt for Property Received," with the exception of those contained in the two manila file folders labeled "EPA" referenced on page 2 of that Receipt.

Therefore, we again request that we receive back all of these documents as promptly as possible so that we can make an accurate assessment of our situation. I would be happy to make available my firm's copying facilities if necessary to expedite this matter. For

RECEIVED  
MAY 31 1985

HOLLAND & HART

William F. Smith  
May 30, 1985  
Page 2

clarity, I am enclosing a copy of the EPA Receipt with check marks next to all of those documents for which we wish to receive back the originals or copies. Thank you for your prompt attention to this request.

Sincerely yours,

  
Paul D. Phillips  
of HOLLAND & HART

PDP:cas  
Enclosure

cc: James K. Bredar, Esquire  
Michael Risner, Esquire  
Ms. Joan Sowinski  
Mr. John Minkoff  
Mr. G. David Epstein

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/ReleasedOn (date) 4/25/85

item(s) listed below were:

- ☒ Received From  
☐ Returned To  
☐ Released To

(Name) FRANKEL MANUFACTURING Co  
(Street Address) 5125 RACE COURT  
(City) DENVER

Description of  
Item(s):

- ✓ A. LETTER 1/17/84 Epstein to EPA
- ✓ B. LETTER 1/12/84 Epstein to EPA Region VIII  
and attachment dated 1/5/84 from EPA Denver
- ✓ C New Jersey Register, Tuesday 1/17/84 8 pages
- ✓ 1- NEWSPAPER ARTICLE ENTITLED "TOXIC WASTES  
CAN BE BURNED OFF - PHYSICIST"
- ✓ 1- LETTER FROM CHEMICAL WASTE MANAGEMENT,  
DATED DECEMBER 17, 1980, TO DAVE EPSTEIN  
REGARDING PACKAGING AND SHIPMENT  
REQUIREMENTS OF HAZARDOUS WASTE MATERIAL.
- ✓ 1- COPY OF DOCUMENT OF CHEMICAL WASTE  
MANAGEMENT ENTITLED "WASTE APPROVAL  
SEQUENCE."
- ✓ 1- EPA REGULATION Pamphlet REGARDING CERCLA  
DIRECTIVES.
- ✓ 1- DOCUMENT CONSISTING OF 3 PAGES ENTITLED  
"DRUM RECEIVING GUIDELINES FOR DENVER  
ARAPAHOE CHEMICAL WASTE PROCESSING  
FACILITY" DATED 19 NOV. 1980.
- ✓ 1- PACKAGE CONSISTING OF NUMEROUS  
CORRESPONDENCE WITH OCCUPATIONAL SAFETY  
AND HEALTH ADMINISTRATION, DURING  
1981.

Received by:

K. W. Wahl EPA

(Signature)

Received from

(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released

On (date) APRIL 25, 1985

item(s) listed below were:

- ☒ Received From  
☐ Returned To  
☐ Released To

(Name) FRANKEL MANUFACTURING(Street Address) 5125 RACE COURT(City) DENVERDescription of  
Item(s):

- ✓ 1 - MANILA FILE FOLDER ENTITLED "UNION CHEMICAL DIV '84", CONTAINING <sup>ORIGINAL RAW</sup> COPIES OF PURCHASE ORDERS OF VARIOUS KINDS OF CHEMICALS PURCHASED IN 1984.
- ✓ 4 - MANILA FILE FOLDERS ENTITLED "CHEMICAL SALES COMPANY" CONTAINING <sup>ORIGINAL RAW</sup> COPIES OF PURCHASE ORDERS OF VARIOUS KINDS OF CHEMICALS PURCHASED IN 1982, 1983, 1984 AND 1985.
- ✓ 1 - <sup>ORIGINAL RAW</sup> COPY OF INVOICE # 100268, DATED 8-19-81, OF OIL & SOLVENT PROCESS COMPANY (OSCO).
- ✓ 1 - LARGE PICTURE (COLOR) OF FRANKEL MFG CO (APPROX 87" x 45")
- ✓ 3 - SETS BLUEPRINTS OF FRANKEL MFG CO.
- 1 - MANILA FILE FOLDER LABELED "EPA" CONTAINING DOCUMENTS
- 1 - MANILA FILE FOLDER LABELED "EPA" CONTAINING DOCUMENTS + PUBLICATIONS
- ✓ 1 - STATE OF COLORADO DOCUMENT (DECISION # C85-353 CASE # 6112 DATED MARCH 12, 1985)
- ✓ 1 - MEMO DATED APRIL 12, 1985 FROM DICK THOMPSON
- ✓ 1 - COPY OF DOCUMENT ENTITLED "INDEX OF SPECIFICATION OF RAW MATERIAL", DATED 9-14-84.
- ✓ 1 - COPY OF A LIST CONTAINING VARIOUS KINDS OF CHEMICALS ~~USED~~ <sup>RAW</sup> USED IN THEIR MANUFACTURING PROCESS.

Received by:

R. A. WARD - EPA  
(Signature)

Received from

(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released

On (date) APRIL 25, 1985

item(s) listed below were:

- ☒ Received From  
☐ Returned To  
☐ Released To

(Name) FRANKEL MANUFACTURING

(Street Address) 5125 RACE COURT

(City) DENVER

Description of  
Item(s):

- ✓ 1- PACKAGE CONSISTING OF 15 SAFETY DATA SHEETS PERTAINING TO PRODUCTS IN THE MANUFACTURING OF INK.
- ✓ 1- COPY OF LETTER ADDRESSED TO MR. DONALD J. SHOSKY, U.S. EPA REGION 8, DATED FEB. 18, 1981.
- ✓ 1- COPY OF WASTE MANIFEST, OIL & SOLVENT PROCESS CO. (OSED), DATED 2/17/81.
- ✓ 1- COPY OF "GENERATOR'S WASTE MATERIAL PROFILE SHEET" CONSISTING OF 4 PAGES, DATED 2/11/81.
- ✓ 1- COPY OF LETTER <sup>PACKAGE</sup> FROM DICK THOMSON TO "ALL COATING DEPARTMENT PERSONNEL", DATED APRIL 12, 1985, CONSISTING OF 5 PAGES.
- ✓ 1- COPY OF LETTER PACKAGE FROM COMMISSIONERS RONALD L. LEHR AND EDYTHE S. MILLER, DATED MARCH 12, 1985, REGARDING THE SHIPPING OF HAZARDOUS MATERIALS AND HAZARDOUS WASTES CONSISTING OF SIX PAGES.
- ✓ 1- VOLUME ENTITLED "EMPLOYEE DATA BASE" DATED 10-80 THRU 12-83.
- ✓ 1- VOLUME ENTITLED "EMPLOYEE DATA BASE" DATED 1984.
- ✓ 1- COMPUTER PRINTOUT OF CURRENT EMPLOYEE LIST.
- ✓ 1- FEDERAL REGISTER BOOK DATED MAY 19, 1980, REGARDING EPA'S HAZARDOUS WASTE AND CONSOLIDATED PERMIT REGULATIONS.

Received by:

Robert G. Ward - EPA

(Signature)

Received from

(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/ReleasedOn (date) APRIL 25, 1985

item(s) listed below were:

- ☐
- Received From
- 
- ☐
- Returned To
- 
- ☐
- Released To

(Name) FRANKEL MANUFACTURING  
(Street Address) 5125 RACE COURT  
(City) DENVERDescription of  
Item(s):✓ 1 - PACKAGE CONSISTING OF <sup>KAW</sup> 43 PAGES OF  
VARIOUS JOB DESCRIPTIONS.

Received by:

LEO A. WALKER-EPA  
(Signature)

Received from

(Signature)

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
Receipt for Property Received/Returned/Released

On (date)

04-25-85

item(s) listed below were:

- ☒ Received From  
☐ Returned To  
☐ Released To

(Name) FRANKEL MFG CO.

(Street Address) 5125 RACE CT

(City) DENVER, CO.

Description of  
Item(s):

81 - ENVIRONMENTAL SAMPLES

Received by:

K. W. McClary  
(Signature)

4-25-85

Received from

(Signature)